

**UNITED STATES DISTRICT COURT****N.D. OF N.Y.****NORTHERN****DISTRICT OF****NEW YORK****UNITED STATES OF AMERICA****v.****Michael Adam  
(04/02/1959)**

MAY 22 2009

**CRIMINAL COMPLAINT****LAWRENCE K. BAERMAN, CLERK****CASE NUMBER: ALBANY (RFT)****1:09-mj-221**

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or between October 2007 and May 2009 in Albany County and elsewhere, in the Northern District of New York, defendant(s) did, (Track Statutory Language of Offense)  
*use a facility or means of interstate or foreign commerce to knowingly attempt to persuade, induce, or entice an individual who has not attained the age of 18 years to engage in a sexual act for which he may be criminally prosecuted*

in violation of Title 18 United States Code, Section(s) 2422(b)

I further state that I am a(n) Investigator with the NYSP and that this complaint is based on the following facts:

**Official Title**

1. Over the course of the past approximate 18 months, I have been acting in an undercover capacity posing online as a 13 year old minor and communicating with Michael Adam using the Internet service Yahoo. During most of these communications, he was online in the State of Maryland and at times the State of Georgia and I was online in the Northern District of New York.

2. During these communications, Adam indicated that he was interested in meeting in the Albany area, in part, for the purpose of engaging in, among other things, masturbation, oral sex and vaginal intercourse with who he believed to be a 13 year old minor.

3. On October 22, 2007, Adam communicated, via webcam, with who he believed to be said female minor. During their conversation, he inquired if the minor had ever had sex and invited her to view him on his web camera. He was viewed wearing woman's lace lingerie and then exposed himself and masturbated.

4. On more than one occasion, Adam directed the minor to go to online pornography sites that he recommended in order for her to view pornographic videos with him. This was used to show the minor acts that he wanted to engage in with her. On several occasions he discussed various sexual acts that he wanted to engage in with the minor.

5. Adam is 50 years old.

6. The use of Yahoo to communicate involved electronic transmissions that traveled from the State of New York to the States of Maryland and Georgia.

7. Vaginal intercourse and oral sex between a 13 year old female and a 50 year old male are crimes in the State of New York under the NYS Penal Law.

Continued on the attached and made a part hereof. Yes X No

  
 Signature of Complainant

**Mary Barrette****Investigator, NYSP**

Sworn to before me, and subscribed in my presence,

May 22, 2009 at  
 Date

Albany, New York  
 City and State

Magistrate Judge Randolph F. Treece  
 Name and Title of Judicial Officer

  
 Signature of Judicial Officer